



HON. SYLVIA O. HINDS-RADIX
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**THE CITY OF NEW YORK
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March 13, 2024

VIA ECF

Hon. Joseph A. Marutollo
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Collins v. N.Y.C. Dep't of Educ. et al.*
23-cv-9248-JAM

Dear Magistrate Judge Marutollo:

I am an Assistant Corporation Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. I write to request that Your Honor extend the time for Defendants New York City Department of Education (“DOE”), the City of New York (“City”), and New York City Public Schools to respond to the Complaint in this action from March 18, 2024 to May 18, 2024. Plaintiff *pro se* has not responded to my requests for her consent to this extension request.

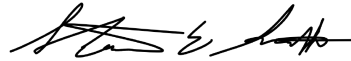
This is the second such request by Defendants. On January 16, 2024, Defendants requested an extension of their time to respond to the Complaint from January 18, 2024 to March 18, 2024 (ECF. No. 12), which Your Honor granted in a docket entry on January 16, 2024.

An extension of time is requested to allow the undersigned to investigate the facts of the case, including obtaining any underlying documentation that may exist with respect to Plaintiff’s allegations, and to formulate an appropriate response to the Complaint. In addition, Plaintiff reached out to Defendants via email to inform that she is filing an Amended Complaint “next week.”

Pursuant to this Court’s Scheduling Order dated December 27, 2023, ECF No. 6, an in-person initial conference is set for April 24, 2024, and the parties must complete and file a proposed Discovery Plan and Scheduling Order by April 19, 2024. Defendants ask that the initial

conference and deadline to submit the proposed Discovery Plan and Scheduling Order be adjourned *sine die* pending the filing of the Amended Complaint. Accordingly, Defendants respectfully request that the time to respond to the Complaint be extended until May 18, 2024, and that any other deadlines be adjourned *sine die*.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Steven E. Smith', with a stylized flourish at the end.

Steven E. Smith
Assistant Corporation Counsel

cc: Latanya Collins
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